

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR QUALITY

**Rhodes, Inc.
100 Quality Court
Charlestown, Indiana 47111**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F019-12729-00041	
Issued by: original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 22, 2002 Expiration Date: February 22, 2007

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary commercial printing facility.

Authorized individual:	Pami Eagan
Source Address:	100 Quality Court, Charlestown, Indiana 47111
Mailing Address:	100 Quality Court, Charlestown, Indiana 47111
General Source Phone Number:	(812) 256-3396
SIC Code:	2752
Source Location Status:	Clark
County Status:	Nonattainment for ozone Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) Web Heatset Offset Press, referred to as C700A, constructed in June, 1989, with a printing width of sixty-six (66) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by two incinerators;
- (b) One (1) Web Heatset Offset Press, referred to as C700B, constructed in March, 1993, with a printing width of sixty-six (66) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by two incinerators;
- (c) Two (2) Web Heatset Offset Presses, referred to as C500A and C500B, both constructed in January, 1992, each with a printing width of forty (40) inches and a maximum line speed of one thousand four hundred and seventy-five (1,475) feet per minute, controlled by two incinerators;
- (d) Two (2) Web Heatset Offset Presses, referred to as C250A and C250B, both constructed in April, 1994, with a printing width of thirty-six (36) inches and a maximum line speed of one thousand four hundred and sixty (1,460) feet per minute, controlled by two incinerators;
- (e) One (1) Web Heatset Offset Press, referred to as C700C, constructed in August, 1995, with a printing width of fifty-eight (58) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by two incinerators; and
- (f) Two (2) thermal incinerators, referred to as ID #19000 and ID #14000, constructed in 1991 and 1995, respectively, with a heat input capacity of 8.1 and 6.0 million Btu per hour, respectively. These incinerators control VOC emissions from C700A, C700B, C500A, C500B, C250A, C250B, and C700C.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (b) Emission units with PM and PM10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, and lead emissions less than two-tenths (0.2) tons per year:
 - (1) Film processors, plate processors, trimmers, and stichers.
 - (2) One (1) Web Nonheatset Offset Press, referred to as 112, constructed in January, 1973, with a printing width of thirty-six (36) inches and a maximum line speed of seven hundred and ninety (790) feet per minute;
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (d) Equipment powered by internal combustion engines of capacity equal to or less than five hundred thousand (500,000) Btu per hour, except where total capacity of equipment operated by one stationary source exceeds two million (2,000,000) Btu per hour.
- (e) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per twelve (12) months;
- (f) Solvent recycling systems with batch capacity less than or equal to one hundred (100) gallons.
- (g) A parts washer with potential, uncontrolled HAP emissions less than one (1) ton per year of a single HAP and two and a half (2.5) tons per year of any combination of HAPs.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or,

for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ, may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the

shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit [326 IAC 2-8-4(5)(C)]. The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall

be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report, or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented immediately after permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request that IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of temperature.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared immediately upon issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is

operating, except for time necessary to perform quality assurance and maintenance activities.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) Web Heatset Offset Press, referred to as C700A, constructed in June, 1989, with a printing width of sixty-six (66) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by two incinerators;
- (b) One (1) Web Heatset Offset Press, referred to as C700B, constructed in March, 1993, with a printing width of sixty-six (66) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by two incinerators;
- (c) Two (2) Web Heatset Offset Presses, referred to as C500A and C500B, both constructed in January, 1992, each with a printing width of forty (40) inches and a maximum line speed of one thousand four hundred and seventy-five (1,475) feet per minute, controlled by two incinerators;
- (d) Two (2) Web Heatset Offset Presses, referred to as C250A and C250B, both constructed in April, 1994, with a printing width of thirty-six (36) inches and a maximum line speed of one thousand four hundred and sixty (1,460) feet per minute, controlled by two incinerators;
- (e) One (1) Web Heatset Offset Press, referred to as C700C, constructed in August, 1995, with a printing width of fifty-eight (58) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by two incinerators; and
- (f) Two (2) thermal incinerators, referred to as ID #19000 and ID #14000, constructed in 1991 and 1995, respectively, with a heat input capacity of 8.1 and 6.0 million Btu per hour, respectively. These incinerators control VOC emissions from C700A, C700B, C500A, C500B, C250A, C250B, and C700C.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards (PM) [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 8-1-6]

- (a) The amount of VOC delivered to the substrate and the amount of VOC used for cleanup shall be limited to less than one thousand eight hundred and four (1,804) tons per twelve (12) consecutive month period. This limit is equivalent to VOC emissions of less than ninety-six (96) tons per twelve (12) consecutive month period. This will render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.
- (b) Pursuant to 326 IAC 8-1-6, the thermal incinerators shall control the VOC emissions from Press C700A, C700B, C700C, C500A, C500B, C250A, and C250B.

D.1.2 Hazardous Air Pollutants (HAP) [326 IAC 2-8-4]

The amount of any single HAP delivered to the substrate plus the amount of any single HAP used for clean-up are less than ten (10) tons per twelve (12) consecutive month period. The amount of any combination of HAPs delivered to the substrate plus the amount of any combination of HAPs used for clean-up are less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

Any change or modification which may increase the potential emissions of a single HAP to above ten (10) tons per twelve (12) consecutive month period or of any combination of HAPs to

above twenty-five (25) tons per twelve (12) consecutive month period must be approved by the Office of Air Quality before any such change can occur.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Compliance stack tests shall be performed for the 8.1 MMBtu/hr thermal incinerator and the 6.0 MMBtu/hr thermal incinerator to determine the minimum operating temperature that will achieve a 95% destruction efficiency for each incinerator. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.

D.1.5 Thermal Incinerator [326 IAC 8-1-6]

The thermal oxidizer shall operate at all times that the process is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1400EF during operation until a temperature and fan amperage has been determined from the most recent compliant stack test, as approved by IDEM. This temperature and fan amperage shall correspond with a destruction efficiency of 95% for each incinerator. The overall efficiency shall be 95% for ink oil, 66.5% for fountain solution with alcohol substitutes, and 38% for automatic blanket wash solutions with low vapor pressure (VOC composite vapor pressure of less than 10 mmHg at 20EC).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.6 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on the thermal incinerator for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. In the event of malfunction of the temperature recorder, to the extent practicable, intermittent monitoring of the parameter shall be implemented at intervals no less than one hour until such time as the continuous monitor is back in operation.

D.1.7 Press Drying Operation

To demonstrate compliance with D.1.4:

- (a) The press dryer shall be operated at a negative pressure, where no visible emissions of the condensed oil can be seen exiting the dryer. Demonstration of the negative pressure shall be verified using a smoke stick or strips of aluminum foil at all inlets to the dryer. During web breaks or shut down activities, the dryers shall be allowed to operate at printing room pressure as room air and dryer air is ducted to the operating incinerator.
- (b) The automatic blanket wash materials used shall have a vapor pressure less than 10 mm Hg at 20°C and the fountain solution used shall be alcohol based.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.1.1 and D.1.2.

- (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC and HAP usage for each month;
 - (4) The weight of VOCs and HAPs emitted for each compliance period, considering capture and control efficiency, if applicable. The control efficiency is assumed to be 95% for ink oil, 66.5 for fountain solution with alcohol substitutes, and 38% for automatic blanket wash solutions with low vapor pressures (VOC composite vapor pressure of less than 10 mmHg at 20EC);
 - (5) The continuous temperature records for the thermal incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test;
 - (6) The VOC destruction efficiency of the thermal incinerators; and
 - (7) The total VOC delivered to the substrate plus the total VOC used for cleanup.
- (b) To document compliance with Conditions D.1.5 and D.1.6, the Permittee shall maintain records of the thermal incinerator operating temperature.
- (c) To document compliance with D.1.7, the Permittee shall maintain records of the vapor pressure of the automatic blanket wash materials. Records shall also be maintained of the fountain solutions that were used and if they were alcohol based.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activities

- (a) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (b) Emission units with PM and PM10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, and lead emissions less than two-tenths (0.2) tons per year:
 - (1) Film processors, plate processors, trimmers, and stichers.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Rhodes, Inc.
Source Address: 100 Quality Court, Charlestown, Indiana 47111
Mailing Address: 100 Quality Court, Charlestown, Indiana 47111
FESOP No.: F019-12729-00041

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Rhodes, Inc.
Source Address: 100 Quality Court, Charlestown, Indiana 47111
Mailing Address: 100 Quality Court, Charlestown, Indiana 47111
FESOP No.: F019-12729-00041

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Branch**

FESOP Quarterly Report

Source Name: Rhodes, Inc.
Source Address: 100 Quality Court, Charlestown, Indiana 47111
Mailing Address: 100 Quality Court, Charlestown, Indiana 47111
FESOP No.: F019-12729-00041
Facility: Presses C700A, C700B, C700C, C500A, C500B, C250A, C250B, 112
Parameter: VOCs
Limit: The amount of VOC delivered to the substrate and the amount of VOC used for cleanup shall be limited to less than 1,804 tons per 12 consecutive months period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Branch**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Rhodes, Inc.
Source Address: 100 Quality Court, Charlestown, Indiana 47111
Mailing Address: 100 Quality Court, Charlestown, Indiana 47111
FESOP No.: F019-12729-00041

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

February 22, 2002

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the Technical Support Document
for Federally Enforceable State Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name:	Rhodes, Inc.
Source Location:	100 Quality Court, Charlestown, Indiana 47111
County:	Clark
SIC Code:	2752
Operation Permit No.:	F019-12729-00041
Permit Reviewer:	ERG/KC

On November 5, the Office of Air Quality (OAQ) had a notice published in The Evening News, Jeffersonville, Indiana, stating that Rhodes, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a commercial printing source with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 30, Rhodes, Inc. submitted comments on the proposed FESOP Renewal. The summary of the comments is as follows:

Comment 1:

The source noted that Condition D.1.1 (Volatile Organic Compounds) limited the source to using less than 1,804 tons per year of VOC. The source understands that this limit was calculated using the 95% destruction efficiency required in the permit. Even though the permit only requires a 95% destruction efficiency, the thermal oxidizer is currently running at 99%. Therefore, the condition currently limits them to the usage of less VOC than they can actually use to still emit less than 96 tons per year of VOC. The source would like the condition to limit the source to less than 96 tons per year of VOC emissions:

Response to Comment 1:

No change was made as result of this comment. The limits contained in the permit must be practically enforceable and limiting the source to less than 96 tons per year of VOC emissions is not practically enforceable. Since the permit requires a minimum destruction efficiency of 95% per the BACT determination, the limit must be calculated using this efficiency. Rhodes has been informed that if approved testing has been performed, the minimum destruction efficiency in the permit can be increased from 95% to 99%. If this were to happen, the operating temperature would need to be changed and the VOC input limit could be recalculated using the 99% destruction efficiency. However at this time, Rhodes does not want to increase the minimum destruction efficiency in the permit. The source is aware that they can apply to amend this permit in the future if they decide to increase the minimum destruction efficiency.

Upon further review, IDEM, OAQ made the following changes to the permit:

1. A.5 Prior Permits Superseded was added to the permit to help clarify the intent of the new rule 326 IAC 2-1.9.5.

~~A.5 Prior Permit Conditions~~

-
- ~~(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.~~
- ~~(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, **(and local agency when applicable)** shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.~~

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

-
- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either**
- (1) incorporated as originally stated,**
 - (2) revised, or**
 - (3) deleted**
- by this permit.**
- (b) All previous registrations and permits are superseded by this permit.**
2. The IDEM, OAQ, has revised Condition B.15 Deviations from Permit Requirements and Conditions to address concerns regarding the independent enforce ability of permit conditions [see 326 IAC 2-8-4(5)]. B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

-
- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:**

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

~~The notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~
- (1) ~~An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
- (2) ~~Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.
3. Several conditions were modified by removing language stating that the condition was not federally enforceable. Federal law states that failure to comply with any permit condition issued under a program that has been approved into a State Implementation Plan (SIP) is to be treated as a violation of the SIP (40 CFR 52.23). This has the effect of making all FESOP conditions federally enforceable. Indiana's FESOP program was approved as a part of Indiana's SIP at 40 CFR 52.788. Neither the program nor the underlying rule, 326 IAC 2-8 contains provisions for designating certain conditions as not federally enforceable.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.~~

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. ~~326 IAC 9-1-2 is not federally enforceable.~~

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~326 IAC 6-4-2(4) is not federally enforceable.~~

4. 326 IAC 2-8-3 requires any application form, report, or compliance certification to be certified by the authorized individual. IDEM, OAQ has revised C.7 Asbestos Abatement Projects to clarify that the asbestos notification does not require a certification by the authorized individual, but it does need to be certified by the owner or operator. IDEM, OAQ has revised C.16 Actions Related to Noncompliance Demonstrated by a Stack Test; a certification by the authorized individual is required for the notification sent in response to non-compliance with a stack test.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

5. The IDEM, OAQ has restructured C.15 to clarify the contents and implementation of the compliance response plan. The name of the condition has changed to better reflect the contents of the condition. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. The title Compliance Monitoring Plan - Failure to Take Response Steps has been changed to Compliance Response Plan - Preparation, Implementation, Records, and Reports throughout the permit.

C.15 ~~Compliance Monitoring Response Plan - Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports** [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to **prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:** ~~implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~
- ~~(1) This condition;~~
 - ~~(2) The Compliance Determination Requirements in Section D of this permit;~~
 - ~~(3) The Compliance Monitoring Requirements in Section D of this permit; and~~
 - ~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit.~~
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.**
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.**
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) ~~Upon investigation of a compliance monitoring excursion, the~~ The Permittee is excused from taking **not required to take any** further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment ~~and - This shall be an excuse from taking further response steps providing that~~ prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) **When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emissions limitation has occurred, the Permittee shall report such deviations pursuant to Section B - Deviations from Permit Requirements and Conditions.**
- (e d) ~~Records shall be kept of all instances in which the compliance-related information was not met and of all response steps taken.~~ **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f e) **Except as otherwise provided by a rule or provided specifically in Section D, all** All monitoring ~~as required in Section D shall be performed at all times when the equipment~~ **emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.** ~~If monitoring is required by Section D and the equipment~~

~~is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~

~~(f) — At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

6. In order to ensure that reports are sent to the appropriate division, the following change was made:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
~~Compliance Branch~~**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

7. Pages 6 and 7 of appendix A were inadvertently included in the TSD. To correct this, these pages have been removed.

February 22, 2002

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Federally Enforceable Operating
Permit (FESOP) Renewal**

Source Background and Description

Source Name: Rhodes, Inc.
Source Location: 100 Quality Court, Charlestown, Indiana 47111
County: Clark
SIC Code: 2752
Operation Permit No.: F019-12729-00041
Permit Reviewer: ERG/KC

The Office of Air Quality (OAQ) has reviewed a Renewal FESOP application from Rhodes, Inc. relating to the operation of a commercial printing facility. Rhodes, Inc. was issued FESOP 019-6173-00041 on December 10, 1996.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) Web Heatset Offset Press, referred to as C700A, constructed in June, 1989, with a printing width of sixty-six (66) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by two thermal incinerators;
- (b) One (1) Web Heatset Offset Press, referred to as C700B, constructed in March, 1993, with a printing width of sixty-six (66) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by two thermal incinerators;
- (c) Two (2) Web Heatset Offset Presses, referred to as C500A and C500B, both constructed in January, 1992, each with a printing width of forty (40) inches and a maximum line speed of one thousand four hundred and seventy-five (1,475) feet per minute, controlled by two thermal incinerators;
- (d) Two (2) Web Heatset Offset Presses, referred to as C250A and C250B, both constructed in April, 1994, with a printing width of thirty-six (36) inches and a maximum line speed of one thousand four hundred and sixty (1,460) feet per minute, controlled by two thermal incinerators;
- (e) One (1) Web Heatset Offset Press, referred to as C700C, constructed in August, 1995, with a printing width of fifty-eight (58) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by two thermal incinerators; and
- (f) Two (2) thermal incinerators, referred to as ID #19000 and ID #14000, constructed in 1991 and 1995, respectively, with a heat input capacity of 8.1 and 6.0 million Btu per hour, respectively. These incinerators control VOC emissions from C700A, C700B, C500A, C500B, C250A, C250B, and C700C.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this renewal review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new emission units and pollution control equipment receiving new source review approval during this renewal review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (b) Emission units with PM and PM10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, and lead emissions less than two-tenths (0.2) tons per year:
 - (1) Film processors, plate processors, trimmers, and stichers.
 - (2) One (1) Web Nonheatset Offset Press, referred to as 112, constructed in January, 1973, with a printing width of thirty-six (36) inches and a maximum line speed of seven hundred and ninety (790) feet per minute.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (d) Equipment powered by internal combustion engines of capacity equal to or less than five hundred thousand (500,000) Btu per hour, except where total capacity of equipment operated by one stationary source exceeds two million (2,000,000) Btu per hour.
- (e) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per twelve (12) months;
- (f) Solvent recycling systems with batch capacity less than or equal to one hundred (100) gallons.
- (g) A parts washer with potential, uncontrolled HAP emissions less than one (1) ton per year of a single HAP and two and a half (2.5) tons per year of any combination of HAPs.

Existing Approvals

The source had operated under previous approvals including, but not limited to, the following:

F019-6173-00041, issued on December 10, 1996 and expiring on December 10, 2001.

All conditions from previous approvals were incorporated into this FESOP except the following.

Condition Not Included: D.1.5(a) of F019-6173-00041.

- (a) The thermal incinerator shall be operated at all times that the emission unit(s) vented to them is in operation at above 10% of the maximum rated press speed.

Reasons Not Included: In order to be more accurate, the above condition was replaced with the following: During web breaks or shut down activities, the dryers shall be allowed to operate at printing room pressure as room air and duct air is ducted to the operating incinerator.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Renewal FESOP application for the purposes of this review was received, in a timely manner, on September 22, 2000, fifteen (15) months prior to expiration.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 5). Emission calculations were taken from FESOP 019-6173-00041.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	0
PM-10	0
SO ₂	0
VOC	2161
CO	0
NO _x	0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Unrestricted Potential Emissions (tons/year)
Naphthalene	4.92
1,2,4 - Trimethylbenzene	0.95
Glycol Ether	5.52
TOTAL	11.39

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable

State Operating Permit (FESOP). The source has chosen to limit VOC emissions to below one hundred (100) tons per (12) consecutive month period.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 10, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Because the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (F019-6173-00041; issued on December 10, 1996).

	Potential to Emit After Issuance (tons/year)						
Process/Facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Printing	0	0	0	96	0	0	11.39 (total)
Press 112 - insignificant	0	0	0		0	0	0
Insignificant Activities	0	0	0	3.3	0	0	0
Total Emissions	0	0	0	99.3	0	0	11.39 (total)

County Attainment Status

The source is located in Clark County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as nonattainment for ozone.

- (b) Clark County has been classified as attainment or unclassifiable for PM-10, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source. 40 CFR Part 60, Subpart E (Standards of Performance for Incinerators) does not apply because the thermal incinerators do not meet the definition incinerator definition in 40 CFR 60.51. The incinerators are used as a control device and are not burning municipal waste. 40 CFR Part 60, Subpart QQ (Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing) and Subpart FFF (Standards of Performance for Flexible Vinyl and Urethane Coating and Printing) do not apply because these rules apply to rotogravure printing presses and the presses at the source are all web heatset offset and nonheatset offset presses.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source. 40 CFR Part 63, Subpart KK is not applicable because this rule applies to publication, and product and packaging rotogravure and flexographic printing presses and the presses at the source are all web heatset offset and nonheatset offset presses. 40 CFR Part 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning) is not applicable because this rule applies to batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machines. This source does not contain this equipment.

State Rule Applicability - Entire Source

326 IAC 2-4.1 (New Source Toxics Control)

326 IAC 2-4.1 (New Source Toxics Control) is not applicable because source is not a major source of HAPs.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 2-8-4 (FESOP)

The amount of VOC delivered to the substrate and the amount of VOC used for clean-up shall not exceed a total of ninety-six (96) tons per twelve (12) consecutive month period. Emissions of each single HAP are less than 10 tons per twelve (12) consecutive month period and emissions of any combination of HAPs are less than 25 tons per twelve (12) consecutive month period. Thus, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

326 IAC 6-3-2 (Process Operations)

- (a) 326 IAC 6-3-2 (Process Operations) does not apply to the presses or thermal incinerators because they do not emit any PM.
- (b) Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from the insignificant trimmers which have a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the thermal incinerators shall control the VOC emissions from Press C700A, C700B, C700C, C500A, C500B, C250A, and C250B. Additionally, the thermal incinerator shall maintain a minimum operating temperature of 1400EF or the temperature determined during the latest stack test. This temperature should achieve a 95% destruction efficiency for each incinerator. The overall efficiency shall be 95% for ink oil, 66.5% for fountain solution with alcohol substitutes, and 38% for automatic blanket wash solutions with low vapor pressures (VOC composite vapor pressure of less than 10 mmHg at 20EC). The incinerators shall operate at negative pressure. During web breaks or shut down activities, the dryers shall be allowed to operate at printing room pressure as room air and duct air is ducted to the operating incinerator. A continuous monitoring system shall be calibrated, maintained, and operated on the thermal incinerators for measuring operating temperature. The output of this system shall be recorded, and the temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. In the event of malfunction of the temperature recorder, to the extent practicable, intermittent monitoring of the parameter shall be implemented at intervals no less than one hour until such time as the continuous monitor is back in operation.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

326 IAC 8-3 (Organic Solvent Degreasing Operations) does not apply to this source because this source does not perform organic solvent degreasing.

326 IAC 8-5-5 (Graphic Arts Operations)

326 IAC 8-5-5 (Graphic Arts Operations) does not apply to this source because the rule pertains to rotogravure and flexographic printing presses while the presses at the source are all web heatset offset and nonheatset offset presses.

326 IAC 8-6 (Organic Solvent Emission Limitations)

326 IAC 8-6 (Organic Solvent Emission Limitations) is not applicable to this source because the rule only applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980. This source was constructed after 1980.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) does not apply to this source because the source has limited VOC emissions to below the 100 tons per year threshold of applicability for this rule.

326 IAC 10 (Nitrogen Oxides Control in Clark and Floyd Counties)

326 IAC 10 is not applicable to this source because the source does not emit any NOx.

Testing Requirements

Testing is required for the thermal incinerators because they claim control efficiency of greater than eighty-five percent (85%). The control efficiency is necessary to meet the FESOP limits.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as

grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The presses have applicable compliance monitoring conditions as specified below:
 - (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal incinerator for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. In the event of malfunction of the temperature recorder, to the extent practicable, intermittent monitoring of the parameter shall be implemented at intervals no less than one hour until such time as the continuous monitor is back in operation.
 - (b) The press dryer shall be operated at a negative pressure, where no visible emissions of the condensed oil can be seen exiting the dryer. Demonstration of the negative pressure shall be verified using a smoke stick or strips of aluminum foil at all inlets to the dryer.
 - (c) The automatic blanket wash materials used shall have a vapor pressure less than 10 mm Hg at 20°C and the fountain solution used shall be alcohol based.

These monitoring conditions are necessary because the thermal incinerators for the presses must operate properly to ensure compliance with 326 IAC 2-8 (FESOP).

Conclusion

The operation of this commercial printing facility shall be subject to the conditions of the attached proposed renewal FESOP No.: F019-12729-00041.

Appendix A: Emission Calculations

VOC Emissions

Uncontrolled

Company Name: Rhodes, Inc.

Address City IN Zip: 100 Quality Court, Charlestown, Indiana 47111

Plant ID: 019-00041

Permit Number: F019-12729-00041

Reviewer: ERG/KC

Date: 04/10/2001

C700A

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin ² /yr)
C700A	2300	14507	66	957433

Ink Name	Maximum Coverage (lb/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /yr)	VOC Emissions (ton/yr)
Ink	3	43%	80%	957433	494.04
Fountain Solution	0.015	0%	100%	957433	0.00
Cleaning Solution	0.005	100%	100%	957433	2.39
Cleaning Solution	0.0005	100%	100%	957433	0.24
Miscellaneous	0.00002	75%	100%	957433	0.01
Total					496.68

C700B

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin ² /yr)
C700B	2300	14507	66	957433

Ink Name	Maximum Coverage (lb/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /yr)	VOC Emissions (ton/yr)
Ink	3	43%	80%	957433	494.04
Fountain Solution	0.015	0%	100%	957433	0.00
Cleaning Solution	0.005	100%	100%	957433	2.39
Cleaning Solution	0.0005	100%	100%	957433	0.24
Miscellaneous	0.00002	75%	100%	957433	0.01
Total					496.68

C700C

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin ² /yr)
C700C	2300	14507	58	841380

Ink Name	Maximum Coverage (lb/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /yr)	VOC Emissions (ton/yr)
Ink	3	43%	80%	841380	434.15
Fountain Solution	0.015	0%	100%	841380	0.00
Cleaning Solution	0.005	100%	100%	841380	2.10
Cleaning Solution	0.0005	100%	100%	841380	0.21
Miscellaneous	0.00002	75%	100%	841380	0.01
Total					436.47

C500A

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin ² /yr)
C500A	1475	9303	40	372125

Ink Name	Maximum Coverage (lb/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /yr)	VOC Emissions (ton/yr)
Ink	3	43%	80%	372125	192.02
Fountain Solution	0.015	0%	100%	372125	0.00
Cleaning Solution	0.005	100%	100%	372125	0.93
Cleaning Solution	0.0005	100%	100%	372125	0.09
Miscellaneous	0.00002	75%	100%	372125	0.00
Total					193.04

C500B

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin ² /yr)
C500B	1475	9303	40	372125

Ink Name	Maximum Coverage (lb/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /yr)	VOC Emissions (ton/yr)
Ink	3	43%	80%	372125	192.02
Fountain Solution	0.015	0%	100%	372125	0.00
Cleaning Solution	0.005	100%	100%	372125	0.93
Cleaning Solution	0.0005	100%	100%	372125	0.09
Miscellaneous	0.00002	75%	100%	372125	0.00
Total					193.04

C250A

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin ² /yr)
C250A	1460	9209	36	331506

Ink Name	Maximum Coverage (lb/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /yr)	VOC Emissions (ton/yr)
Ink	3	43%	80%	331506	171.06
Fountain Solution	0.015	0%	100%	331506	0.00
Cleaning Solution	0.005	100%	100%	331506	0.83
Cleaning Solution	0.0005	100%	100%	331506	0.08
Miscellaneous	0.00002	75%	100%	331506	0.00
Total					171.97

C250B

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin ² /yr)
C250B	1460	9209	36	331506

Ink Name	Maximum Coverage (lb/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /yr)	VOC Emissions (ton/yr)
Ink	3	43%	80%	331506	171.06
Fountain Solution	0.015	0%	100%	331506	0.00
Cleaning Solution	0.005	100%	100%	331506	0.83
Cleaning Solution	0.0005	100%	100%	331506	0.08
Miscellaneous	0.00002	75%	100%	331506	0.00
Total					171.97

112

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin ² /yr)
112	790	4983	36	179377

Ink Name	Maximum Coverage (lb/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /yr)	VOC Emissions (ton/yr)
Ink	3	8%	5%	179377	1.08
Cleaning Solution	0.0005	100%	100%	179377	0.04
Total					1.12

Methodology

Throughput = Maximum line speed (ft/min) * 12 (in/ft) * 60 (min/hr) * 8760 (hr/yr) * Maximum print width (in) * 1/1000000

VOC = Maximum coverage (lb/MMin²) * Weight % Volatiles * Flash Off % * Throughput * 1/2000 (ton/lb)

Appendix A: Emission Calculations
HAP Emissions

Page 4 of 5 TSD APP A

Company Name: Rhodes, Inc.
Address City IN Zip: 100 Quality Court, Charlestown, Indiana 47111
Plant ID: 019-00041
Permit Number: F019-12729-00041
Reviewer: ERG/KC
Date: #####

HAPs	Throughput (MMin ² /yr)	Maximum Coverage (lb/MMin ²)	HAP Weight %	Flash Off %	Potential Uncontrolled HAPs Emissions (ton/yr)	Overall Control Efficiency (%)	Controlled HAPs Emissions (ton/yr)
C700A							
Blanket Wash							
Naphthalene	957433	0.005	37%	100%	0.89	82%	0.16
1,2,4 - Trimethylbenzene	957433	0.005	7%	100%	0.17	82%	0.03
Glycol Ether	957433	0.005	35%	100%	0.84	82%	0.15
Technical Wash							
Naphthalene	957433	0.0005	29%	100%	0.07	82%	0.01
1,2,4 - Trimethylbenzene	957433	0.0005	6%	100%	0.01	82%	0.00
Glycol Ether	957433	0.0005	73%	100%	0.17	82%	0.03
Take it Off							
1,2,4 - Trimethylbenzene	957433	0.00002	6%	100%	0.00	82%	0.00
Glycol Ether	957433	0.00002	73%	100%	0.01	82%	0.00
C700B							
Blanket Wash							
Naphthalene	957433	0.005	37%	100%	0.89	93%	0.06
1,2,4 - Trimethylbenzene	957433	0.005	7%	100%	0.17	93%	0.01
Glycol Ether	957433	0.005	35%	100%	0.84	93%	0.06
Technical Wash							
Naphthalene	957433	0.0005	29%	100%	0.07	93%	0.00
1,2,4 - Trimethylbenzene	957433	0.0005	6%	100%	0.01	93%	0.00
Glycol Ether	957433	0.0005	73%	100%	0.17	93%	0.01
Take it Off							
1,2,4 - Trimethylbenzene	957433	0.00002	6%	100%	0.00	93%	0.00
Glycol Ether	957433	0.00002	73%	100%	0.01	93%	0.00
C700C							
Blanket Wash							
Naphthalene	841380	0.005	37%	100%	0.78	86%	0.11
1,2,4 - Trimethylbenzene	841380	0.005	7%	100%	0.15	86%	0.02
Glycol Ether	841380	0.005	35%	100%	0.74	86%	0.10
Technical Wash							
Naphthalene	841380	0.005	29%	100%	0.61	86%	0.09
1,2,4 - Trimethylbenzene	841380	0.005	6%	100%	0.13	86%	0.02
Glycol Ether	841380	0.005	37%	100%	0.78	86%	0.11
Take it Off							
1,2,4 - Trimethylbenzene	841380	0.00002	1%	100%	0.00	86%	0.00
Glycol Ether	841380	0.00002	37%	100%	0.00	86%	0.00

C250A							
Blanket Wash							
Naphthalene	331506	0.005	37%	100%	0.31	95%	0.02
1,2,4 - Trimethylbenzene	331506	0.005	7%	100%	0.06	95%	0.00
Glycol Ether	331506	0.005	35%	100%	0.29	95%	0.01
Technical Wash							
Naphthalene	331506	0.005	29%	100%	0.24	95%	0.01
1,2,4 - Trimethylbenzene	331506	0.005	6%	100%	0.05	95%	0.00
Glycol Ether	331506	0.005	73%	100%	0.60	95%	0.03
Take it Off							
1,2,4 - Trimethylbenzene	331506	0.00002	1%	100%	0.00	95%	0.00
Glycol Ether	331506	0.00002	37%	100%	0.00	95%	0.00
C250B							
Blanket Wash							
Naphthalene	331506	0.005	37%	100%	0.31	95%	0.02
1,2,4 - Trimethylbenzene	331506	0.005	7%	100%	0.06	95%	0.00
Glycol Ether	331506	0.005	35%	100%	0.29	95%	0.01
Technical Wash							
Naphthalene	331506	0.0005	29%	100%	0.02	95%	0.00
1,2,4 - Trimethylbenzene	331506	0.0005	6%	100%	0.00	95%	0.00
Glycol Ether	331506	0.0005	73%	100%	0.06	95%	0.00
Take it Off							
1,2,4 - Trimethylbenzene	331506	0.00002	1%	100%	0.00	95%	0.00
Glycol Ether	331506	0.00002	37%	100%	0.00	95%	0.00
C500A							
Blanket Wash							
Naphthalene	372125	0.005	37%	100%	0.34	90%	0.03
1,2,4 - Trimethylbenzene	372125	0.005	7%	100%	0.07	90%	0.01
Glycol Ether	372125	0.005	35%	100%	0.33	90%	0.03
Technical Wash							
Naphthalene	372125	0.0005	29%	100%	0.03	90%	0.00
1,2,4 - Trimethylbenzene	372125	0.0005	6%	100%	0.01	90%	0.00
Glycol Ether	372125	0.0005	73%	100%	0.07	90%	0.01
Take it Off							
1,2,4 - Trimethylbenzene	372125	0.00002	1%	100%	0.00	90%	0.00
Glycol Ether	372125	0.00002	37%	100%	0.00	90%	0.00
C500B							
Blanket Wash							
Naphthalene	372125	0.005	37%	100%	0.34	85%	0.05
1,2,4 - Trimethylbenzene	372125	0.005	7%	100%	0.07	85%	0.01
Glycol Ether	372125	0.005	35%	100%	0.33	85%	0.05
Technical Wash							
Naphthalene	372125	0.0005	29%	100%	0.03	85%	0.00
1,2,4 - Trimethylbenzene	372125	0.0005	6%	100%	0.01	85%	0.00
				Total HAPs	11.39		1.30
				Total Naphthalene Emissions	4.92		0.57
				Total 1,2,4 - Trimethylbenzene Emissions	0.95		0.11
				Total Glycol Ether Emissions	5.52		0.62

Methodology

HAP emissions = Throughput (MMin²/yr) * Maximum Coverage (lb/MMin²) * HAP Weight % * Flash Off % *
1/2000 (ton/lb)